

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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IVAN SANTIAGO,	)	
Plaintiffs,	)	C.A No. 04-10746 JLT
	)	
v.	)	<b>PLAINTIFF IVAN SANTIAGO'S</b>
	)	<b>ASSENTED-TO MOTION TO ENLARGE</b>
WILLIAM J FEENEY, MARCUS,	)	<b>TIME TO FILE HIS OPPOSITION TO THE</b>
EDDINGS, and the CITY OF BOSTON,	)	<b>DEFENDANTS' MOTION FOR SUMMARY</b>
Defendants	)	<b>JUDGMENT AND TO FILE HIS MOTION</b>
	)	<b>FOR SUMMARY JUDGMENT</b>

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Now comes the Plaintiff Ivan Santiago in the above-captioned proceeding and respectfully requests that this Honorable Court enlarge the time in which he must file his Opposition to the Defendants Marcus Eddings' and William Feeney's Motion For Summary Judgment, the Defendant City of Boston's Motion For Summary Judgment, and in which he must file his Plaintiff's Motion For Summary Judgment, until Wednesday, May 4, 2005. As grounds therefor, the Plaintiff states as follows:

1. That he must respond to *three* defendants' *two* motions, and that 14 days is not enough time to respond to two motions for summary judgment involving three defendants and, in addition, prepare his own motion for summary judgment;
2. That the Plaintiff's Opposition and own Motion are substantially completed but that he needs more time to finish them;
3. That Plaintiff's attorney, Jessica D Hedges, will be out-of-state from Tuesday, April 26, 2005 through Thursday, April 28, 2005, as she is being sworn into the state bar of West Virginia;
4. That this is the Plaintiff's first request for an enlargement of time, and that said request is both reasonable and necessary; and,

5. That counsel for the Defendants, Stephen G Cox, assents to this Motion.

Respectfully submitted,  
The Plaintiff Ivan Santiago,  
By his attorneys,

//S//Jessica D Hedges  
Stephen Hrones (BBO No. 242860)  
Jessica D Hedges (BBO No. 645847)  
HRONES & GARRITY  
Lewis Wharf–Bay 232  
Boston, MA 02110-3927  
T)617/227-4019

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I, Jessica D Hedges, hereby certify that, on April 26, 2005, our office legal assistant spoke with Stephen G Cox, counsel to the Defendants, informed him of my intent to file this Motion and requested and obtained his assent to this Motion.

//S//Jessica D Hedges

**CERTIFICATE OF SERVICE**

I, Jessica D Hedges, hereby certify that on this 26th day of April, 2005, I have served a copy of the foregoing PLAINTIFF IVAN SANTIAGO'S ASSENTED-TO MOTION TO ENLARGE TIME TO FILE HIS OPPOSITION TO THE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND TO FILE HIS MOTION FOR SUMMARY JUDGMENT, where unable to do so electronically, via United States, First-Class Mail, postage prepaid, as follows: Stephen G Cox, Asst Corp Counsl, City of Boston/Law Dept, City Hall, Rm 615, Boston, MA 02201.

//S//Jessica D Hedges  
Jessica D Hedges